EXHIBIT D

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From:

dayid boshea Gregory Jordan

To: Subject:

Fw: revision trial prep

Date:

Friday, January 19, 2024 8:33:33 AM

Attachments:

Compass Trial Preparation[2305843009252926909].docx

From: david boshea

Sent: Tuesday, September 12, 2023 7:33 AM

To: michaelrwhite@comcast.net < Michaelrwhite@comcast.net>; Daniel White

<danieljwhite@msn.com>
Subject: revision trial prep

David J. Boshea, Jr.
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Compass Trial Preparation

1) My Compass beginning:

- I wrote Compass Marketing business plan while at Pfizer (1997) to start a alternate channel (Non FDM) department for Pfizer.
- We (Dan White, John White, Bob Morgan, Me) took my business plan and formed Compass Marketing (1997).
- We all took 25% share of Compass but I put my shares on hold because I stayed with Pfizer. Compass became one of my partners while at Pfizer. Bob Morgan resigned and Mike White took Bobs 25% shares.
- In the spring of 2007 John White came to my house several to talk me into joining Compass. At that time I was National Account Manager enjoying a great growth career. My wife and I were very hesitant in joining a startup company which was struggling. So, John White started talking to me about a severance agreement. John White put together nice job offer which included a severance package which paid 3 years of my \$180K salary. My wife and I discussed it. Due to the severance agreement, we decided I would leave my successful career at Energizer and start with Compass as EVP in May 2007.
- I went out to Compass office in May to do my onboarding paperwork. I brought my severance with me for John White to sign but I had a few asks I had. John White sad could not add to the agreement. John White signed it and then I signed it.
- I was off to working hard until March 2020. I grew the business 3 fold.
- March 2020 my position was eliminated without cause. The letter from Compass was very appreciative of my service and positive contributions.
- I then made every effort to receive my agreed upon severance pay of 3 years of my salary to no avail. John White ignored all my communications.

2) Pros:

- Gregory James Jordan
- Mike White
- Dan white
- David Boshea
- Larence Scott
- The Truth
- I have multiple emails from John White regarding my severance agreement
- John White BCC Dan White (Compass Lawyer) my severance agreement who emailed it to Mike White (Compass HR VP)
- I have a signed severance agreement by John White.

- John Whites writing specialist said john white has 19 different signatures and changes with his mood.
- David Boshea's specialist says she can't specify John Whites signature's
- John White stated in his deposition that Compass General Counsel Lawrence Scott would know about my severance.
- Lawrence Scott Compass Marketing General Council drafted my agreement.
- Lawrence Scott had exact worded contract as mine bus was for 2 years of salary.... Mike White and Dan White know about it .
- John Adams has the same worded severance package but only received 1 year salary because he was in a lower teer.
- John White stated in his deposition that Mike White along with Dan White new about
 my agreement and called me to remind me of this agreement. They discussed it with me
 like professionals. When I left Pfizer, the HR VP flew to Chicago to remind me of my
 severance and to explain it. Point is I have experienced with this type of transaction
 before.
- John White does not remember things back in 2007.
- Iam adding more Greg and if you want to revise or add to it please do.

3) Cons:

• I cant think of any.